BEFORE THE

Federal Communications Commission

WASHINGTON, D.C.

In the matter of	)	
	)	
Application by Verizon New England	)	
Inc., Bell Atlantic Communications,	)	
Inc., (d/b/a Verizon Long Distance),	)	CC Docket No. 01-9
NYNEX Long Distance Company,	)	
(d/b/a/ Verizon Enterprise Solutions),	)	
and Verizon Global Networks Inc. for	)	
Authorization to Provide In-region,	)	
InterLATA Services in Massachusetts	)	

COMMENTS OF SPRINT COMMUNICATIONS COMPANY L.P.
ON VERIZON NEW ENGLAND'S SUPPLEMENTAL SECTION 271 APPLICATION

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I. INTRODUCTION AND SUMMARY

Sprint Communications Company L.P. ("Sprint") hereby files its comments regarding the above-captioned supplemental application of Verizon New England for authorization to provide in-region, interLATA services in Massachusetts.[1] Sprint limits its comments to the issues addressed in that supplement and to updating certain additional problems raised in Sprint's initial comments. In so limiting these comments, Sprint by no means suggests that Verizon is complying with its other obligations under Section 271. Accordingly, in order to preserve those issues and in conformity with the Commission's Public Notice, Sprint hereby incorporates the entirety of its initial comments, filed October 16, 2000, into this proceeding. As demonstrated below, Verizon's supplemental application fails to correct the deficiencies in its

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[1] Supplemental Filing of Verizon New England for Authorization to Provide In-region, InterLATA Services in Massachusetts, CC Dkt. No. 01-9 (filed Jan. 16, 2001) ("Supp. Brief").

original filing, including its obligation to provide CLECs access to loop qualification information in accordance with the Commission's UNE Remand Order, its duty to demonstrate that rates for UNEs are cost-based, and the continued existence of a lack of numbering resources that acts as a barrier to local entry in Massachusetts. Because Verizon does not meet the requisite statutory standards, its application cannot be granted at this time.

II. VERIZON'S SUPPLEMENTAL APPLICATION FAILS TO DEMONSTRATE COMPLIANCE WITH THE SECTION 271 CHECKLIST.

A. Verizon Has Not Demonstrated That It Provides Access To Loop Qualification Information In Compliance With The Commission's UNE Remand Order.

"One of the fundamental goals of the Telecommunications Act of 1996 ("Act") is to promote innovation and investment by all participants in the telecommunications marketplace, in order to stimulate competition for all services, including advanced services."[2] As the Commission has recognized, xDSL-based products, such as Sprint's ION, will allow end users to make "ordinary voice calls over the public switched network at the same time as he or she is using the same line for high-speed data transmission,"[3] thus ultimately revolutionizing the way consumers communicate. Yet, in order to promote competition for advanced services, the Commission must ensure that competitors are able to obtain timely and nondiscriminatory access to xDSL loops and, as discussed below, loop qualification information.

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2 Deployment of Wireline Services Offering Advanced Telecommunications Capability, 14 FCC Rcd 4761, ¶ 1 (1999) ("Advanced Services Order"). The importance of data to future competition cannot be understated. According to Verizon, "data traffic has already surpassed voice traffic on [its] networks - and, with data capacity doubling every 90 days as opposed to every 12 years for voice, the lead is lengthening rapidly." See Verizon News Archive, "Local Exchange Carriers' Entry into Long Distance - Impact on the Development of Advanced Technology" at 1-2 (Feb. 17, 2000) <http://newscenter.verizon.com/proactive/newsroom/release.vtml?id=37351&>.

3 Advanced Services Order ¶ 10.

Verizon, apparently in an attempt to minimize the importance of its xDSL performance, argues in its supplemental filing that xDSL loops "represent a tiny fraction of the local competition in Massachusetts." Supp. Brief at 4. In contrast to its lawyers, Verizon's executives, however, appear well aware of the importance of xDSL to the company's future. For example, during a recent Financial Times World Telecommunications Conference, Verizon President and Co-Chief Executive Officer Ivan Seidenberg indicated that Verizon is "deploying the new DSL platform across [its] footprint, which will help [it] drive the next wave of innovation and growth, through local broadband platforms."[4] Verizon is also "rapidly deploying DSL capabilities to the last mile" and has publicly committed to making "DSL available to 10 M[illion] households by the first quarter of the year 2000, [and] 20 M[illion] by year end [2000]."[5] The Commission should make no mistake about it; access to xDSL is critical to the future of local competition. Indeed, it has said as much in prior Section 271 orders.[6] The only

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4 See Verizon News Archive, Financial Times World Telecommunications Conference, "Managing on the Fault Line," Remarks of Ivan Seidenberg at 3 (Dec. 4, 2000) <http://newscenter.verizon.com/proactive/newsroom/release.vtml?id=46608&> ("Verizon Remarks").

5 See Verizon News Archive, "Creating the Networks of the Future" at 3 (Oct. 5, 2000) <http://newscenter.verizon.com/proactive/newsroom/release.vtml?id=43828> (remarks of Ivan Seidenberg) ("By the end of this year, 60 percent of the households we serve will have access to 640 kb/s, and we expect that to ramp up quickly in the next several years in terms of both speed and coverage."); Verizon News Archive, Progress & Freedom Foundation's 5th Annual Summit, Remarks of Ivan Seidenberg at 3 (Aug. 23, 1999) <http://newscenter.verizon.com/proactive/newsroom/release.vtml?id=19437&>. Verizon has also met its commitment to the investment community to have 500,000 DSL subscribers by year end 2000. Verizon Remarks at 4.

6 See, e.g., Application by SBC Communications, Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance to Provide In-region, InterLATA Services in Texas, 15 FCC Rcd 18354, ¶ 282 (2000) (noting that "xDSL-capable loops are a substantial and growing portion of all unbundled loops provisioned" in Texas); Application by Bell Atlantic New York for Authorization to Provide In-region, InterLATA Service in the State of New York, 15 FCC Rcd 3953, ¶ 330 (1999) ("New York Order") ("Given our statutory obligation to encourage the deployment of advanced services and the critical importance of the provisioning of xDSL loops to the development of the advanced

question is whether xDSL will be available competitively, or whether it will be controlled by incumbent LECs such as Verizon.

Verizon can preclude the competitive provisioning of advanced broadband services by denying reasonable nondiscriminatory access to the inputs essential to such services generally, and to Sprint ION specifically. Verizon's denial of complete access to loop information is particularly anticompetitive, as Sprint described in its initial comments.[7] Arguing that it has no general obligation to provide CLECs access to all loop data in its possession, Verizon's position flouts the UNE Remand Order's plain mandate that an ILEC provide nondiscriminatory access to all loop qualification information in its possession, including digital loop carrier ("DLC") data.[8] See UNE Remand Order ¶ 427 ("incumbent LECs must provide requesting carriers the same underlying information that the incumbent LEC has in any of its own databases or other internal records"). Moreover, the order requires Verizon to produce this information on an unfiltered basis. Id. ¶ 428 (ILEC "may not filter or digest such information"). It further mandates that Verizon give these data to CLECs not only on a loop-by-loop basis, but

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service marketplace, we emphasize our intention to examine this issue closely in the future."), aff'd, AT&T Corp. v. FCC, 220 F.3d 607 (D.C. Cir. 2000).

7 As explained in Sprint's comments, Verizon also continues to resist language proposed by Sprint that was lifted nearly verbatim from FCC orders regarding the ILEC's UNE obligations. See Sprint Comments at 21, CC Dkt. No. 00-176 (filed Oct. 17, 2000) ("Sprint Comments") (citing 47 C.F.R. § 51.319). Consistent with the Commission's UNE Remand Order, Sprint had sought access to line conditioning, packet switching, call-related databases, subloop, subloop element-inside wire, dark fiber and loop information databases on a nondiscriminatory, unfiltered basis. Verizon refused this request and once having forced Sprint to arbitrate, submitted contract language that unduly limited and restricted Sprint's ability to utilize these UNEs. The Massachusetts arbitration order overlooked this issue entirely and Sprint has accordingly sought reconsideration there.

8 See Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, 15 FCC Rcd 3696 (1999) ("UNE Remand Order").

also on the basis of the "zip code of the end users in a particular wire center, NXX code, or on any other basis that the incumbent provides information to itself." Id. ¶ 427. In so ruling, the FCC clarified that, "the relevant inquiry is not whether the retail arm of the incumbent has access to the underlying loop qualification information, but rather whether such information exists *anywhere* within the incumbent's back office and can be accessed by any of the incumbent's personnel. Denying competitors access to such information, where the incumbent (or the affiliate, if one exists) is able to obtain the relevant information for itself, will impede the efficient deployment of advanced services." Id. ¶ 430 (emphasis added).

These obligations were reemphasized in the FCC's review of SBC's 271 application for Oklahoma and Kansas last month.[9] As reiterated there, any information residing in the ILEC's internal records regarding loop plant, including the presence of digital loop carrier or other remote concentration devices, must be shared with requesting carriers. Kansas/Oklahoma Order ¶ 121. And again the Commission opined that the ILEC "must provide loop qualifying information based, for example, on an individual address or *zip code of the end users in a particular wire center, NXX code or on any other basis*" on which the ILEC itself has access. Id. (emphasis added).

Notwithstanding these orders, Verizon has argued that its obligations stop at line-by-line inquiries, and it has refused to give Sprint access to essential information in Verizon's possession regarding digital loop carriers used in the Massachusetts network. Sprint has

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[9] See Joint Application by SBC Communications, Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance for Provision of In-region, InterLATA Services in Kansas and Oklahoma, CC Dkt. No. 00-217, Memorandum Opinion and Order ¶¶ 121-125 (rel. Jan. 22, 2001) (FCC 01-29) ("Kansas/Oklahoma Order").

specifically stated that it is not asking Verizon to create a new database, but rather to gain access to data that plainly Verizon possesses regarding the location and other demographic information relating to its DLCs. Verizon has of course not claimed that it lacks such data; it has insisted instead that it can withhold the information requested because it believes that Sprint intends to use the information for planning or marketing purposes.[10] But nowhere does the UNE Remand Order endorse the view that the ILEC can selectively withhold some information from some CLECs because it does not approve of the lawful, competitive use to which the data might be put. Significantly, other ILECs have provided this information in marked contrast to Verizon's refusals.

In its supplemental filing, Verizon devotes several pages to explaining why it has not yet provided electronic access to the LFACS database, that is, the data are not any good, they are incomplete, access is too expensive, etc. But regardless of this particular dispute involving other CLECs' claims, Verizon fails altogether to answer Sprint's unmet request for DLC information. While Verizon indignantly represents that no CLEC "submitted the [LFACS] issue to arbitration in Massachusetts or any other state," it wholly omits the fact that Sprint has indeed submitted the DLC information access issue to arbitration in Massachusetts, and has sought access to this information on a multistate basis -- only to be turned down by Verizon everywhere. Further, while Verizon attempts to use the New York DSL collaborative process as a shield for not being more forthcoming with essential data here, whatever little progress there might be in New York cannot serve to justify Verizon's adamant refusals in Massachusetts.

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[10] See Position Statement of Verizon Massachusetts at 13-18, Petition of Sprint Communications Company L.P. for an Arbitration Award of Interconnection Rates, Terms, and Conditions Pursuant to 47 U.S.C. § 252(b) and Related Arrangements with Bell Atlantic-Massachusetts, Inc., DTE Dkt. No. 00-54 (filed Sept. 8, 2000).

In the Massachusetts arbitration, the DTE mistakenly accepted Verizon's argument that the information sought by Sprint is not required by the UNE Remand Order.[11] At Verizon's insistence, the DTE misinterpreted the order such that, "[w]hile the FCC explicitly contemplated that CLECs would require some information about DLCs and other remote concentration devices, the FCC appears to have limited access to information concerning the '...existence, location, and type' of remote concentration devices." DTE Arbitration Order at 16. Accordingly, the DTE incorrectly found that "the information sought by Sprint goes beyond what is required by the UNE Remand Order" and that it would "not require Verizon to provide Sprint with additional information" on DLCs that Sprint requested (*i.e.*, the technical parameters of the DLC, the technical parameters of the plant, and the potential number of xDSL customers). Id.

In addition to refusing to implement the FCC's order in the states, Verizon has also tried to get the FCC to reverse course here. Under the guise of seeking clarification, Verizon sought Commission reversal of its UNE Remand Order in order to reject CLECs' rights "to direct access to the same paper records and systems containing loop information that are used by the incumbent carriers' back office personnel."[12] It has now used that petition as a pretext for not complying with the order. Supp. Brief at 13-14 n.10. Claiming that CLECs are seeking superior access, Verizon argues that "what competing carriers are really asking for is. . . *the*

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[11] Petition of Sprint Communications Company L.P., Pursuant to Section 252(b) of the Telecommunications Act of 1996, for Arbitration of Interconnection Agreement between Sprint and Verizon-Massachusetts, DTE Dkt. No. 00-54, Arbitration Order at 16 (Dec. 11, 2000) <http://www.state.ma.us/dpu/telecom/00-54/Sprint_arb_order.pdf> ("DTE Arbitration Order").

[12] Bell Atlantic Petition for Reconsideration and Clarification at 15-16, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Dkt. No. 96-98 (filed Feb. 17, 2000) ("Verizon Petition").

ability to access directly the systems that store that information." Verizon Petition at 16 (emphasis added).[13] But that is exactly what the UNE Remand Order requires:

> [T]he relevant inquiry is not whether the retail arm of the incumbent has access to the underlying loop qualification information, but rather whether such information exists anywhere within the incumbent's back office and can be accessed by any of the incumbent LEC's personnel. * * * To permit an incumbent LEC to preclude requesting carriers from obtaining information about the underlying capabilities of the loop plant in the same manner as the incumbent LEC's personnel would be contrary to the goals of the Act to promote innovation and deployment of new technologies by multiple parties.

UNE Remand Order ¶ 430. Verizon is plainly trying to have it both ways; it claims to be cooperating for purposes of pushing through its 271 application while otherwise resisting fully its extant legal obligations to provide direct access to this information. While Verizon's 271 application insists that it has satisfied its obligations "[r]egardless of how the Commission resolves the pending clarification petition," because "any such requirement is not self-effectuating," Supp. Brief at 13 n.10, the fact is that Verizon has refused to negotiate such access requested by Sprint and has argued to the state public utility commission that it has no obligation to negotiate terms and conditions for such access. The application should not be granted until Verizon provides the required access to DLC information.

B. Verizon's UNE And Interconnection Rates Fail To Comport With TELRIC.

Section 271 requires Verizon to provide access to unbundled network elements ("UNEs") and interconnection at cost-based rates and on terms and conditions that are just, reasonable, and nondiscriminatory. 47 U.S.C. §§ 271(c)(2)(B)(i), (ii). The Commission has interpreted this statutory mandate to require that prices for interconnection and UNEs be based

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[13] Verizon argues that regulations requiring such access would be illegal. Verizon Petition at 16.

on total element long run incremental cost ("TELRIC").[14] In determining whether a BOC has fully implemented this requirement of the competitive checklist, the Commission -- not the state commission -- has "the *exclusive responsibility* for determining whether a BOC has priced . . . unbundled network elements . . . in accordance with the pricing requirements set forth in section 252(d)."[15] As AT&T and WorldCom have demonstrated, neither Verizon's freshly discounted switching and transport rates nor its rates for other UNEs, including loops, comply with basic TELRIC principles. Where, as here, basic TELRIC principles have been violated and the prices established "fall[] outside the range that the reasonable application of TELRIC principles would produce," the Commission must deny the application. Cf. New York Order ¶ 244.

Verizon's October 13, 2000 "voluntary" rate reductions ostensibly lowered the price for unbundled local switching and transport to the rates approved by the New York commission. Yet, as has been documented by AT&T, the switching rates adopted in New York are not cost-based. Specifically, in setting switching rates, the New York commission relied on testimony that Verizon did not receive large volume discounts on switches from its vendors.[16] Subsequently, AT&T adduced evidence that, in fact, Verizon did receive substantial discounts from its switch vendors. AT&T Reply at 28. Since that time, the New York commission has

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14 The Supreme Court recently granted petitions for *certiorari* requesting review of the Eighth Circuit's vacatur of the Commission's TELRIC rules. Iowa Utils. Bd. v. FCC, 219 F.3d 744 (8th Cir. 2000), *cert. granted sub nom.* Verizon Communications v. FCC, 69 U.S.L.W. 3495 (U.S. Jan. 22, 2001) (No. 00-511). In the meantime, the Eighth Circuit has stayed the effect of its ruling, pending review by the Supreme Court. See Iowa Utils. Bd. v. FCC, No. 96-3321, Order Granting Motion for Partial Stay of the Mandate (8th Cir. Sept. 22, 2000).

15 Application of Ameritech Michigan to Provide In-region, InterLATA Services in Michigan, 12 FCC Rcd 20543, ¶ 282 (1997) ("Michigan Order") (emphasis added).

16 AT&T Reply Comments at 28 (citing New York Order ¶ 247), CC Dkt. No. 00-176 (filed Nov. 2, 2000) ("AT&T Reply").

indicated that it will consider this evidence in its ongoing pricing proceeding. Id. at 29 ("The New York Commission held that, while it had initially been persuaded by Bell Atlantic that it did not receive large switch discounts from its vendors, AT&T later presented new evidence on such discounts, which the New York Commission will examine in its second network elements rate case." New York Order ¶ 247). At a minimum, absent (1) assurances that the Massachusetts' switching and transport rates will continue to track New York rates, and (2) a demonstration that Verizon's costs in Massachusetts are equal to or higher than its costs in New York, the Commission cannot possibly find Verizon's revised rates to be TELRIC-compliant.

Even if the Commission were to decide that it is appropriate for Verizon to unilaterally export New York's switching and transport rates into Massachusetts with no further showing as to TELRIC, such reliance would not cure the problems with Verizon's rates for other UNEs, especially loops. As AT&T and WorldCom have demonstrated, the DTE committed the following clear errors in setting UNE loop rates in Massachusetts:

- the cost of capital (12.16%) is set 200 basis points higher than any other state in Verizon's region; is higher than the Commission's generous cost of capital (11.25%); and is more heavily weighted towards equity (76%) than the Commission's approved capital structure of 55.8% equity (44.2% debt) financing;
- the utilization factor for fiber feeder is set at 60%, a gross understatement compared to the Commission's use of a factor of 100% in the Universal Service proceeding;
- the utilization factor for copper feeder cable is set at 60-75%, compared to the Commission's use of an 80% factor in the Universal Service proceeding;
- the utilization factor for copper distribution cable is set at 40% for metropolitan, urban, and suburban areas, far below the 50-75% factor used by the Commission in the Universal Service proceeding;[17] and

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[17] The Commission recently found that the Oklahoma Commission's adoption of a 30% fill factor for distribution cable was unreasonable: "a fill factor that assumes that more than two-thirds of capacity is idle for an indefinite time is unreasonably low." Kansas/Oklahoma Order ¶ 80. In so noting, the Commission compared the 30% fill factor to its USF fill factor (50-75%), the Kansas Commission's fill factor (53%) and the New York Commission's fill factor (50%). Just as the

- other errors associated with the costs of pole inputs and NIDs.[18]

WorldCom has further demonstrated that, once these errors are corrected, Verizon's average loop rate would decline from 17-30% *per month*, depending on the geographic density zone. See WorldCom *Ex Parte*, Attachment at 14. Moreover, the DTE's error with regard to the cost of capital permeates *every* Massachusetts UNE rate, rendering them non-cost-based. AT&T Reply at 13 (citing DTE Evaluation at 330 (conceding that the cost of capital is "an input to all UNE prices")).

The Commission has previously held that where, as here, there are clear errors in the state commission's factual findings that cause the end results to fall outside of the range that the reasonable application of TELRIC would produce, it will reject a BOC's application for 271 relief. See, e.g., New York Order ¶ 244; Kansas/Oklahoma Order ¶ 74. Verizon's application must be rejected on this basis.

III. Verizon's Entry Into The In-region, InterLATA Market In Massachusetts Cannot Be In The Public Interest Until The Numbering Crisis Has Been Resolved.

As Sprint indicated in its initial comments, satisfaction of the competitive checklist alone is an insufficient basis upon which to conclude that a BOC's Section 271 application is in the public interest. Sprint Comments at 15. Although Verizon's reply attempted to sweep the numbering crisis under the checklist item (xi) rug, in so doing, Verizon failed to recognize that concerns about numbering resources involve fundamental issues of market structure and entry barriers under the public interest requirements of Section 271. As the

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use of a 30% fill factor in Oklahoma was unreasonable, so is the DTE's use of a 40% factor unreasonable here.

[18] See AT&T Reply at 10, 13-19; WorldCom Reply Comments at 12-13, CC Dkt. No. 00-176 (filed Nov. 3, 2000); *Ex Parte* from Keith L. Seat, WorldCom, to Magalie R. Salas, FCC, Attachment at 14, CC Dkt. No. 00-176 (filed Dec. 4, 2000) ("WorldCom *Ex Parte*").

Commission has previously found, "compliance with the checklist will not necessarily assure that all barriers to entry to [the] local telecommunications market have been eliminated." Michigan Order ¶ 390. The inability of new entrants to obtain sufficient numbering resources to enter and compete in the local market in Massachusetts is precisely the type of entry barrier that requires the Commission to conclude that Verizon's entry into the interLATA services market is not in the public interest at this time.

Since Sprint filed its initial comments in this proceeding, neither the Commission nor the DTE has acted to alleviate the numbering crisis in Massachusetts. First, the DTE's petition for delegation of additional authority to implement number conservation measures, which was filed with the Commission on August 2, 2000, remains pending.[19] Second, the DTE has not yet taken further action in any of the separate state proceedings addressing the numbering crisis in Massachusetts.[20] As Sprint noted in its comments, the DTE has ordered the implementation of four new overlay area codes in eastern Massachusetts by April 2001. See Sprint Comments at 8. Assuming the implementation remains on schedule, those numbers will not be available until May 2001 *at the earliest*, and may well not be available until August 2001

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19 See Massachusetts DTE Petition for Delegation of Additional Authority to Implement Number Conservation Measures in Massachusetts, Numbering Resource Optimization, CC Dkt. No. 99-200 (filed Aug. 2, 2000).

20 See Petition of NeuStar, Inc., as the North American Numbering Plan Administrator and on Behalf of the Massachusetts Telecommunications Industry, for Area Code Relief for the 413 Area Codes in Western Massachusetts, DTE Dkt. No. 00-64; Proceeding by the DTE to Conduct Mandatory Thousands-Block Number Pooling Trials Pursuant to the Authority Delegated by the FCC, DTE Dkt. No. 99-99; Petition of Lockheed Martin IMS, the NANPA, for Area Code Relief for the 508, 617, 781 and 978 Area Codes in Eastern Massachusetts, DTE Dkt. No. 99-11; Investigation by the DTE on Its Own Motion to Determine the Need for New Area Codes in Eastern Massachusetts and Whether Measures Could Be Implemented to Conserve Exchange Codes Within Eastern Massachusetts, DTE Dkt. No. 98-38. Up-to-date information on these dockets can be retrieved at <http://www.state.ma.us/scripts/dpu/qorders/frmDocketList.asp>.

or later, if the DTE decides that it must continue number rationing until pooling procedures are instituted. Id. at 9-10. Even if rationing does not continue after these new codes are created, it may take several months for many CLECs to obtain a sufficient footprint to compete with Verizon on an economic basis, thus pushing back their full competitive entry even further.[21]

In addition to these obstacles for short term fixes, the DTE has not undertaken the necessary steps to provide an effective, long term remedy. The FCC has repeatedly recognized that rate center consolidation (especially prior to the implementation of thousands-block number pooling and area code relief) will increase the efficiency of number conservation measures and that the ability to implement such relief is within the existing authority of the states,[22] but the DTE continues to decline to pursue consolidation. Absent such long term remedies, CLECs will be denied timely and economically efficient entry into the local market in Massachusetts.

The continued numbering crisis in Massachusetts demonstrates a fundamental entry barrier that precludes finding the Massachusetts' local markets to be fully and irreversibly open to competition. Thus, a grant of the application is not in the public interest at this time.

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21 As noted in Sprint's comments, prior to thousands-block number pooling and under continued rationing, the DTE's monthly allocation would not allow one CLEC to cover one-quarter of the 202 rate centers in eastern Massachusetts. See Sprint Comments at 10 n.24.

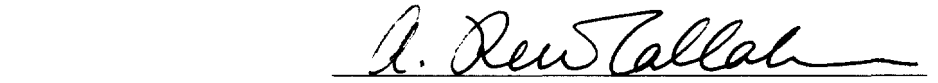
22 Numbering Resource Optimization, CC Dkt. No. 99-200, Second Report and Order, Order on Reconsideration, and Second Further Notice of Proposed Rulemaking ¶¶ 146-147 (rel. Dec. 29, 2000) (FCC 00-429). In that report, the Commission also established a competitive bidding process to elect a national Pooling Administrator; the FCC expects that a Pooling Administrator will be selected by the end of the first quarter of 2001. A schedule for implementing mandatory number pooling will be established only after an administrator is chosen. Id. ¶¶ 37, 181.

CONCLUSION

For the foregoing reasons, Verizon's supplemental application must be denied.

Respectfully submitted,

Sprint Communications Company L.P.



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Dated: February 6, 2001

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CERTIFICATE OF SERVICE

I, S. Anna Sucin, do hereby certify that copies of the foregoing Comments of Sprint Communications Company L.P. on Verizon New England's Section 271 Application in Massachusetts, CC Docket No. 01-9, were hand-delivered on February 6, 2001, unless otherwise indicated, to the following parties:

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